

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**MEDIENT STUDIOS, INC., FONU2,
INC., MANU KUMARAN, JOEL A.
“JAKE” SHAPIRO, and ROGER
MIGUEL,**

Defendants.

**Case No. 4:16-cv- 00253
WTM-GRS**

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE SUMMARY JUDGMENT MOTION**

Plaintiff Securities and Exchange Commission (the “Commission”) moves this Court for a one week extension to file a motion for summary judgment following the close of discovery. Counsel for the Commission has conferred with counsel for Defendant Joel A. “Jake” Shapiro and represents that they have no opposition to this motion.

Pursuant to the Court’s January 30, 2017 Scheduling Order [Dkt. 17.], discovery closes on July 28, 2017, and the last day for filing civil motions is August 16, 2017. The parties have sought, and been granted, permission to hold

the deposition of Defendant Joel A. “Jake” Shapiro on Wednesday, August 2, 2017, which is 5 days beyond the close of discovery as set forth in the Scheduling Order. [Dkt. 26-27.] In order to allow the Commission time to digest and incorporate Shapiro’s testimony, the Commission respectfully moves the Court for an additional 30 days, until September 15, 2017, to file a motion for summary judgment.

For the foregoing reasons, the Commission respectfully requests that the Court grant a 30 day extension for filing a summary judgment motion, from August 16, 2017 to September 15, 2017.

Dated: July 21, 2017

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of this Court using the CM/ECF system which will send notice of such filing to counsel of record.

/s/W. Shawn Murnahan
W. Shawn Murnahan
Senior Trial Counsel